

**LOWENSTEIN SANDLER PC**

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*Counsel to Debtor and Debtor-in-Possession*

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:

OCEAN PLACE DEVELOPMENT LLC,  
  
Debtor.

Chapter 11

Case No. 11-14295 (MBK)

**NOTICE OF FILING OF DEBTOR'S MOTION PURSUANT TO  
11 U.S.C. 105(a) AND FEDERAL RULES OF BANKRUPTCY PROCEDURE  
2002(a)(3) AND 9019(a) FOR ENTRY OF AN ORDER APPROVING A  
SETTLEMENT AND COMPROMISE BETWEEN THE DEBTOR  
AND THE WEST PACES HOTEL GROUP, LLC**

**PLEASE TAKE NOTICE** that, on the date hereof, the Debtor filed its *Motion Pursuant To 11 U.S.C. 105(a) And Federal Rules Of Bankruptcy Procedure 2002(a)(3) and 9019(a) For Entry Of An Order Approving A Settlement And Compromise Between the Debtor and The West Paces Hotel Group, LLC* (the “**Motion**”);

**PLEASE TAKE FURTHER NOTICE** that, hearing on the Motion is scheduled for **July 11, 2011 at 2:00 p.m. (ET)** (the “**Hearing Date**”) before the Honorable Michael B. Kaplan in Courtroom 3 of the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608;

**PLEASE TAKE FURTHER NOTICE** that the Debtor shall rely upon the Motion. No brief is necessary as no novel issues of fact or law are presented by the Motion. A proposed form of Order was also submitted therewith. Oral argument is requested in the event an objection is timely filed.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Motion shall conform with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules, and shall be filed with the Bankruptcy Court, and pursuant to Local Bankruptcy Rule 9013-1(d), shall be served upon the undersigned so as to be received no later than seven (7) days prior to the Hearing Date. In the event that no objections are filed, the relief requested in the Motion may be granted without a hearing.

Dated: June 17, 2011

Respectfully submitted,

**LOWENSTEIN SANDLER PC**

/s/ Wojciech F. Jung

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